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FILED

6/4/25

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	Case No.	4:25-cr-00148 AMO
)		
Plaintiff,)	DECLARATION OF CYNTHIA JOHNSON	
)	IN SUPPORT OF THE GOVERNMENT'S	
v.)	MOTION FOR SUMMONS	
)		
TAMIM GHULAM HAIDAR,)		
)		
Defendant.)		

I, Cynthia Johnson, hereby declare as follows:

1. I am a Special Assistant United States Attorney for the Northern District of California, assigned to the prosecution of the above-captioned case. I received the following information from reports and other documents provided by IRS-Criminal Investigation.
2. From no later than in or about February 2021, and continuing through in or about October 2022, TAMIM GHULAM HAIDAR, was a Branch Operations Associate Manager for the Wells Fargo Bank in Union City, CA. During that time, HAIDAR embezzled more than \$947,000 by stealing money from the branch's ATM machines.
3. HAIDAR falsified the balances of the ATMs, by inputting dollar amounts into the bank's system that did not correspond with the actual amount of cash he deposited into the ATMs. HAIDAR would steal the excess cash he did not put into the ATM machines.

DECLARATION IN SUPPORT OF SUMMONS

1 4. HAIDAR deposited most of the criminally derived funds into bank accounts he owned
2 or controlled and used the funds to cover losses he incurred while trading in the foreign
3 currency markets.

4 5. Based on the above-listed facts, there is probable cause to believe that HAIDAR violated
5 18 U.S.C. § 656, Embezzlement by a Bank Officer or Employee, and 18 U.S.C. § 1957,
6 Engaging in Monetary Transactions in Property Derived from Specified Unlawful
7 Activity.

8
9 I declare under penalty of perjury that the foregoing is true and correct to the best of my
10 knowledge and belief. Executed June 4, 2025 in Oakland, California.

11
12 DATED: June 4, 2025

/s/ Cynthia Johnson

CYNTHIA JOHNSON